

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff/Counterclaim Defendant,

v.

TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.;
CHUNGHWA PICTURE TUBES, LTD.;
AND VIEWSONIC CORPORATION,

Defendants/Counterclaim Plaintiffs.

Civil Action No. 05-292 (JJF)

**PLAINTIFF LPL'S MOTION FOR ENTRY OF FINAL JUDGMENT,
INCLUDING ENHANCED DAMAGES, ATTORNEYS' FEES AND EXPENSES,
AND PRE-JUDGMENT INTEREST**

Plaintiff LG.Philips LCD Co., Ltd. ("LPL") hereby moves this Court, based on the jury's verdict of willful infringement against Defendants Chunghwa Picture Tubes, Ltd. ("CPT"), Tatung Company ("Tatung"), Tatung Company of America, Inc. ("Tatung America"), and ViewSonic Corporation ("ViewSonic") (collectively, "Defendants"), for the following relief: (1) entry of final judgment in LPL's favor consistent with the jury's verdict; (2) enhanced damages of three times the \$52,477,000.00 awarded by the jury – *i.e.*, \$157,431,000.00 – against CPT; (3) an award of attorneys' fees and expenses against all Defendants jointly and severally; and (4) award of pre-judgment interest, calculated at the prime rate compounded quarterly.

The reasons in support of this Motion are set forth in Plaintiff LPL's Memorandum of Law in Support of Motion for Final Judgment, Including Enhanced Damages, Attorneys' Fees and Expenses, and Pre-judgment Interest, filed with this Motion. As set forth in LPL's supporting memorandum, entry of final judgment in accordance with the jury's verdict is appropriate. Further, based on the jury's finding of willful infringement and other relevant

factors, the Court should treble damages or otherwise enhance damages as the Court deems just and proper. Additionally, the Court should find this case exceptional and award attorneys' fees and expenses to LPL in an amount to be determined based on further submissions. Finally, the Court should award LPL prejudgment interest at the prime rate, compounded quarterly. Accordingly, LPL respectfully requests that the Court grant this Motion, enter judgment awarding the requested relief, establish a schedule for LPL to submit updated attorneys' fees and expenses, and award such further relief as the Court deems appropriate.

September 1, 2006

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CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on September 1, 2006, he electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send automatic notification of the filing to the following:

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The undersigned counsel further certifies that copies of the foregoing document were sent on September 1, 2006 by email and by hand to the above counsel and by email and first class mail to the following non-registered participants:

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